OBSERVATION REPORT # 41

Numerous metrics in the New Jersey June, July, August and September 2000 Carrier-to-Carrier Reports deviate from the New Jersey Carrier-to-Carrier Guidelines (May 2000), lacking required data and other elements.

Issue

The New Jersey Carrier-to-Carrier Guidelines (May 2000) outlines the reporting requirements of the Carrier-to Carrier (C2C) Report to be generated by Verizon (VZN) on a monthly basis. KPMG Consulting has found discrepancies between these Guidelines and the June, July, August and September 2000 Carrier-to-Carrier Reports.

The tables below list the metrics that were missing from the Carrier-to-Carrier reports (Table 1), data elements that were missing from the Carrier-to-Carrier reports (Table 2), metric descriptions on Carrier-to-Carrier reports which did not fully match the Carrier-to-Carrier Guidelines (Table 3), metric exclusions in the Carrier-to-Carrier Guidelines that are inconsistent with the metric definitions in those Guidelines (Table 4), metrics that were reported as Under Development (UD) when they should have been available (Table 5), incorrect metric standards on Carrier-to-Carrier reports (Table 6), metric calculations in the Carrier-to-Carrier Guidelines that are inconsistent with the metric definitions in those Guidelines(Table 7), and metric descriptions in the Carrier-to-Carrier Guidelines that are inconsistent with metric titles in those Guidelines (Table 8).

Where relevant, the documents used to assess these observations included: the May 2000 New Jersey Carrier-to-Carrier Guidelines, the June, July, August and September 2000 New Jersey Carrier-to-Carrier Reports and Docket Nos. TX98010010 and TX95120631 (including Appendix A and B).

Table 1: Metrics missing from the June, July, August and September 2000 Carrier-to-Carrier Reports

Domain	Metric	Product	Metric Description	Issue
PR	PR-4-01	UNE - Specials	% Missed Appointment - Total	This metric did not appear on the June, July, August or September Carrier-to-Carrier Reports. Only EEL and IOF metrics were reported.
	PR-4-02	UNE - Specials	Average Delay Days - Total	This metric did not appear on the June, July, August or September Carrier-to-Carrier Reports. Only EEL and IOF metrics were reported.

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Table 2: Data elements missing from the June, July, August and September 2000 Carrier-to-Carrier Reports

Domain	Metric	Product	Metric Description	Issue
PR	PR-2-13	Retail-POTS	Average Interval Completed – 2 Wire xDSL (w/DD 2 Test Results, w/800#, w/serial #) (Residential. POTS-2nd Line-Dispatch)	The NJ Carrier-to-Carrier Guidelines require disaggregation of "POTS-Residential 2nd Line-Dispatch". The June, July, August and September 2000 C2C reports did not report "POTS-Residential 2nd line".
	PR-3-10	Retail - POTS	% Completed w/in 6 Days (1-5 Lines) (Residential POTS-2nd Line-Dispatch)	The NJ Carrier-to-Carrier Guidelines require disaggregation of "Residential POTS-2nd Line-Dispatch". The June, July, August and September 2000 C2C reports did not report "POTS- Residential 2nd line".
	PR-4-14	Retail – POTS	% Completed On Time – 2 Wire xDSL (w/DD-2 Test Results, w/800#, w/serial #) (Residential. POTS-2nd Line-Dispatch	The NJ Carrier-to-Carrier Guidelines require disaggregation of "Residential POTS-2nd Line-Dispatch". The June, July, August and September 2000 C2C reports did not report "POTS- Residential 2nd line".
	PR-8-01	UNE - Specials	% Open Orders in a Hold Status > 30 Days	UNE Specials were missing from June 2000 C2C report, but were reported on the July, August and September 2000 C2C reports.
	PR-8-02	UNE – Specials	% Open Orders in a Hold Status > 90 Days	UNE Specials were missing from June 2000 C2C report, but were reported on the July, August and September 2000 C2C reports.
PO	PO-4-01	Change Mgmt. Notices/ Confirm.	% Change Management Notices and Change Management Confirmations Sent On-Time – Total (Change Management Notices and Confirmations Combined; Types 1-5 Combined)	Change management confirmation data was not reported on the June, July, August and September 2000 C2C reports.
	PO-4-02	Change Mgmt. Notices/ Confirm.	Change Management Notices and Change Management Confirmations – Delay 1 to 7 days.	Change management confirmation data was not reported on the June, July, August and September 2000 C2C reports.
	PO-4-03	Change Mgmt. Notices/ Confirm.	Change Management Notices and Change Management Confirmations – Delay 8 or more days.	Change management confirmation data was not reported on the June, July, August and September 2000 C2C reports.

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Domain	Metric	Product	Metric Description	Issue
NP	NP-1-02	Retail – BA Common Final Trunks Trunks – BA to CLEC	% Final Trunk Groups Exceeding Blocking Standard – (No Exceptions)- Common and Dedicated	The space for reporting the data in the September 2000 C2C report was blank.
	NP-5-01	Retail	% of Network Outage Notices sent within 30 minutes	Although the standard is Parity w/Retail, on the June, July, August and September 2000 C2C reports there was no Retail data reported.
	NP-6-01	Retail	% of NXX Updates Installed by the LERG Effective Date	According to the NJ C2C Guidelines, this metric is to be measured and reported on a calendar quarterly basis. Although the standard is Parity w/Retail, there was no Retail data reported on the June and September 2000 C2C reports.

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Table 3: Metric descriptions on the Carrier-to-Carrier reports that did not fully match the descriptions in the Carrier-to-Carrier Guidelines.

Domain	Metric	Product	Metric Description	Issue
PR	PR-2-13	UNE-2 Wire xDSL	Average Interval Completed – 2 Wire xDSL (w/DD 2 Test Results, w/800#, w/serial #) (Residential. POTS-2nd Line-Dispatch)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the 800# from the description.
	PR-2-14	UNE – 2 Wire xDSL	Average Interval Completed – 2 Wire xDSL (w/DD 2 Test Results, w/800#, w/ or w/o serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the 800# and the serial# from the description.
	PR-2-15	UNE – 2 Wire xDSL	Average Interval Completed – 2 Wire xDSL (w/o DD-2 Test Results, w/800#, w/serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the 800# from the description.
	PR-2-16	UNE – 2 Wire xDSL	Average Interval Completed – 2 Wire xDSL (w/o DD-2 Test Results, w/800#, w/ or w/o serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the serial# from the description.
	PR-2-17	UNE – 2 Wire xDSL	Average Interval Completed – 2 Wire xDSL (w/o DD-2 Test Results, w/o 800#, w/o serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the serial# from the description.
	PR-4-14	UNE – 2 Wire xDSL	% Completed On Time – 2 Wire xDSL (w/DD-2 Test Results, w/800#, w/serial #) (Residential. POTS-2nd Line-Dispatch)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the 800# from the description.

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Domain	Metric	Product	Metric Description	Issue
	PR-4-15	UNE – 2 Wire xDSL	% Completed On Time – 2 Wire xDSL (w/DD-2 Test Results, w/800#, w/ or w/o serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the 800# and the serial# from the description.
	PR-4-16	UNE – 2 Wire xDSL	% Completed On Time – 2 Wire xDSL (w/o DD-2 Test Results, w/800#, w/serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the 800# from the description.
	PR-4-17	UNE – 2 Wire xDSL	% Completed On Time – 2 Wire xDSL (w/o DD-2 Test Results, w/800#, w/ or w/o serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the serial# from the description.
	PR-4-18	UNE – 2 Wire xDSL	% Completed On Time – 2 Wire xDSL (w/o DD-2 Test Results, w/o 800#, w/o serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the serial# from the description.

Table 4: Metric exclusions in the Carrier-to-Carrier Guidelines that were inconsistent with the metric definitions in those Carrier-to-Carrier Guidelines.

Domain	Metric	Metric Description	Issue
PR	PR-7	Jeopardy Reports	The wording in the metric exclusion is unclear. Interpreted literally, it is inconsistent with the metric definition. The exclusion should read "Orders that are not complete nor canceled."

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Table 5: Metrics that were reported as Under Development (UD) in the Carrier-to-Carrier Reports, but should have been available as of August 2000, according to Appendix B of Docket Nos. TX98010010 and TX95120631.

Domain	Metric	Product	Metric Description	Issue
PO	PO-8-01	OSS	% On Time- Manual Loop Qualification	This metric was listed as TBD on the August 2000 C2C report. It was supposed to have been implemented by August 1, 2000 according to Attachment B of NJ PUC Order Dockets # TX95120631 and TX98010010. It was reported UD on the September 2000 C2C report.
	PO-8-02	OSS	% On Time- Engineering Record Request	This metric was listed as TBD on the August 2000 C2C report. It was supposed to have been implemented by August 1, 2000 according to Attachment B of NJ PUC Order Dockets # TX95120631 and TX98010010. It was reported UD on the September 2000 C2C report.

Table 6: Incorrect Standards on the June, July, August and September 2000 Carrier-to-Carrier Reports.

Domain	Metric	Product	Metric Description	Issue
OR	OR-1-08	RESALE - POTS UNE – Loop, Platform	% On Time LSRC < 6 Lines - Fax	Standard should be "95% on time within 24 hours". August, September 2000 C2C reports showed "95% on time within 48 hours".
		RESALE /UNE- 2 Wire Digital, 2 Wire xDSL	% On Time LSRC < 6 Lines - Fax	Standard should be "95% on time within 72 hours". September 2000 C2C report showed "95% on time within 96 hours".

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Domain	Metric	Product	Metric Description	Issue
		RESALE /UNE – Specials Non-DSO, DS1, DS3	% On Time LSRC < 6 Lines - Fax	Standard should be "95% on time within 48 hours". August, September 2000 C2C reports showed "95% on time within 72 hours".
	OR-1-10	RESALE – POTS, 2 Wire Digital, 2 Wire xDSL, Specials UNE - Loop, Platform, 2 Wire Digital, 2 Wire xDSL, Specials	% On Time LSRC >/= 6 Lines – Fax	Standard should be "95% on time within 72 hours". August, September 2000 C2C reports showed "95% on time within 96 hours".
	OR-2-08	RESALE - POTS, 2 Wire Digital, 2 Wire xDSL UNE - Loop, Platform	% On Time LSR Reject < 6 Lines - Fax	Standard should be "95% on time within 24 hours". August, September 2000 C2C reports showed "95% on time within 48 hours".
		RESALE /UNE – 2 Wire Digital, 2 Wire xDSL	% On Time LSR Reject < 6 Lines - Fax	Standard should be "95% on time within 72 hours". September 2000 C2C report showed "95% on time within 96 hours".
		RESALE /UNE - Specials	% On Time LSR Reject < 6 Lines - Fax	Standard should be "95% on time within 48 hours". August, September 2000 C2C reports showed "95% on time within 72 hours".

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Domain	Metric	Product	Metric Description	Issue
	OR-2-10	RESALE - POTS, 2 Wire Digital, 2 Wire xDSL, Specials UNE - Loop, Platform, 2 Wire Digital, 2 Wire xDSL, Specials	% On Time LSR Reject >/= 6 Lines – Fax	Standard should be "95% on time within 72 hours". August, September 2000 C2C reports showed "95% on time within 96 hours".

Table 7: Metric calculations in the Carrier-to-Carrier Guidelines that are inconsistent with the metric definitions in those Guidelines.

Domain	Metric	Product	Metric Description	Issue
PO	PO-4-01	Change Mgmt. Notices/ Confirm.	% Change Management Notices and Change Management Confirmations Sent On-Time – Total (Change Management Notices and Confirmations Combined; Types 1-5 Combined)	The metric description in the C2C Guidelines implies that values for change management notices and change management confirmations are to be reported separately. However, the way the formula for the calculation is written suggests that they be combined.
	PO-4-02	Change Mgmt. Notices/ Confirm.	Change Management Notices and Change Management Confirmations – Delay 1 to 7 days.	The metric description in the C2C Guidelines implies that values for change management notices and change management confirmations are to be reported separately. However, the way the formula for the calculation is written suggests that they be combined.

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Domain	Metric	Product	Metric Description	Issue
	PO-4-03	Change Mgmt. Notices/ Confirm.	Change Management Notices and Change Management Confirmations – Delay 8 or more days.	The metric description in the C2C Guidelines implies that values for change management notices and change management confirmations are to be reported separately. However, the way the formula for the calculation is written suggests that they be combined.

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Table 8: Metric descriptions in the Carrier-to-Carrier Guidelines that are inconsistent with metric titles in those Guidelines.

Domain	Metric	Product	Metric Description	Issue
BI	BI-3-01	CRIS	% Billing Adjustments – Including Charges Adjusted Due to Billing Errors Resulting from Order Activity Post Completion Discrepancies.	The metric definition describes a billing *error* measurement, not billing *accuracy*.
BI	BI-3-03	CRIS	% Billing Adjustments – Excluding Charges Adjusted Due to Billing Errors Resulting from Order Activity Post Completion Discrepancies.	The metric definition describes a billing *error* measurement, not billing *accuracy*.

Assessment

To the extent that Verizon does not populate its reports in accordance with the NJ Carrier-to-Carrier Guidelines (May 2000), Verizon is not compliant with decisions of the NJ BPU. Additionally, with these reporting discrepancies CLECs cannot verify that they are being provided with the level of service required by the NJ Carrier-to-Carrier Guidelines. The inconsistencies and inaccuracies of the metric guidelines and carrier-to-carrier reports could create unreliable metric results for the CLECs.

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